

1  
2  
3  
4  
5 UNITED STATES DISTRICT COURT FOR THE  
6 WESTERN DISTRICT OF WASHINGTON  
7 AT SEATTLE

8 ZHANG et al,

9 Plaintiffs,

10 v.

11 UNITED STATES OF AMERICA et al,

12 Defendants.

CASE NO. C19-1211 RSM

STIPULATED MOTION AND ORDER FOR  
EXTENSION OF TIME OF  
NOTING DATE FOR DEFENDANT'S  
MOTION TO DISMISS

13  
14 **JOINT STIPULATION**

15 The parties, hereby stipulate and agree that Defendant's Motion to Dismiss should be noted  
16 for consideration on February 28, 2020 rather than the current date of February 21, 2020. The Court  
17 previously granted Plaintiffs' Motion for Extension of Time to Respond to Defendant's Motion to  
18 Dismiss, from January 13, 2020 to February 17, 2020. Dkt. 12. Defendant had consented to  
19 Plaintiff's requested time extension. Dkt. 11. The Court also ordered that Defendant's Motion to  
20 Dismiss shall be noted for consideration on February 21, 2020. Dkt. 12. Unfortunately, Defendant  
21 consented to this extension of time for Plaintiff without realizing the undersigned counsel would be  
22 out of the office without computer access from February 17, 2020 through February 24, 2020.  
23 Accordingly, the parties hereby stipulate and agree that Defendant's Motion to Dismiss should now

24 STIPULATED MOTION AND ORDER FOR  
EXTENSION OF TIME OF NOTING DATE FOR DEFENDANT'S  
MOTION TO DISMISS  
C19-1211-RSM - 1

UNITED STATES ATTORNEY  
700 STEWART STREET, SUITE 5220  
SEATTLE, WASHINGTON 98101  
(206) 553-7970

1 be noted for consideration on February 28, 2020, to allow Defendant time to respond to Plaintiff's  
2 response, if any.

3 WHEREFORE counsel respectfully requests that this stipulated motion be granted.  
4

5 DATED this 28th day of January, 2020.  
6

7 BRIAN T. MORAN  
8 United States Attorney

9 s/ Huifang Zhang Shunichi Takahashi  
10 Huifang Zhang  
11 Huifang Zhang on behalf of I.G and D.G  
12 Shunichi Takahashi  
Chitose 3-17-10-401  
Sumida-Ku  
Japan  
Tokyo 130-0025

s/ Kristen R. Vogel  
KRISTEN R. VOGEL, NYBA # 5195664  
Assistant United States Attorney  
Western District of Washington  
United States Attorney's Office  
700 Stewart Street, Suite 5220  
Seattle, Washington 98101-1271  
Phone: 206-553-7970  
Email: [kristen.vogel@usdoj.gov](mailto:kristen.vogel@usdoj.gov)  
Attorney for United States

**ORDER**

**IT IS HEREBY ORDERED** that the Plaintiffs' Response to Defendant's Motion to Dismiss is due on February 17, 2020 and that the Defendant's Motion to Dismiss should be noted for consideration on February 28, 2020.

Dated this 29<sup>th</sup> day of January 2020.



**RICARDO S. MARTINEZ**  
**CHIEF UNITED STATES DISTRICT JUDGE**

Presented by:

**BRIAN T. MORAN**  
United States Attorney

s/ Kristen R. Vogel  
KRISTEN R. VOGEL, NYBA # 5195664  
Assistant United States Attorney  
Western District of Washington  
United States Attorney's Office  
700 Stewart Street, Suite 5220  
Seattle, Washington 98101-1271  
Phone: 206-553-7970  
Email: [kristen.vogel@usdoj.gov](mailto:kristen.vogel@usdoj.gov)  
Attorney for United States

s/ Huifang Zhang Shunichi Takahashi  
Huifang Zhang  
Huifang Zhang on behalf of I.G and D.G  
Shunichi Takahashi  
Chitose 3-17-10-401  
Sumida-Ku  
Japan  
Tokyo 130-0025